

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA	)	
	)	
V.	)	No. 21 CR 19
	)	
	)	Hon. Steven C. Seeger
DAVID FOLEY	)	
	)	

**DEFENDANT’S UNOPPOSED MOTION FOR  
AN EXTENSION OF TIME TO FILE REPLY**

Now comes the Defendant, David Foley, by and through his attorney, Cece White, and respectfully requests that this Court enter an order extending the time in which Mr. Foley must file his reply to the government’s response to his post-trial motions. In support, Mr. Foley states as follows:

1. On January 24, 2025, the government filed its response (Dkt. 236) to Mr. Foley’s post-trial motions. Dkt. 234. Mr. Foley’s reply is currently due on February 7, 2025.
2. The government’s response includes detailed descriptions of trial testimony that does not match the defendant’s recollection of the same. The defendant requires the trial transcripts to adequately respond.
3. The transcripts have been ordered. Counsel is appointed and CJA authorization is pending. With standard delivery of 30 days, transcripts are expected to be received by March 6, 2025.
4. Defendant requests an extension of time to file his reply until March 31, 2025.
5. The government has no objection to the defendant’s request for an extension.

For these reasons, the defendant, David Foley, respectfully requests that this Court enter an order extending the deadline by which he must file his reply to March 31, 2025.

Respectfully submitted,

/s/ Cece White

CECE WHITE  
Nishay K. Sanan, Esq.  
53 W. Jackson Blvd., Suite 1424  
Chicago, Illinois 60604  
(312) 692-0360  
[cece@sananlaw.com](mailto:cece@sananlaw.com)